IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

	§	
MARK WALTERS,	§	
PLAINTIFF,	§	
	§	
v.	§	**CIVIL NO. 1:15-CV-850LY**
	§	
JD PALATINE, L.L.C.,	§	
DEFENDANT	§	

PLAINTIFF'S DESIGNATION OF PROPOSED WITNESSES, TESTIFYING EXPERTS, & PROPOSED EXHIBITS

COMES NOW, the Plaintiff, Mark Walters, and files this Witness and Exhibit List per the scheduling order issued by this Honorable Court.

A. *DESIGNATION OF PROPOSED WITNESSES*

Plaintiff may call any one or more of the following witnesses:

Mark Walters
P.O. Box 28072
Austin, Texas 78755
512-964-4343

Tim Planz
JD Palatine
Oxford One Centre 301 Grant Street
Suite 4300
Pittsburgh, PA 15219
877-745-8525

Mark Gesch
1104 Celtic Cove
Round Rock, TX 78681
512-845-9062

Mariela Banda
Round Rock ISD
1311 Round Rock Ave.
Round Rock, Texas 78681
512-464-5070

Michella Barrera
Round Rock ISD
1311 Round Rock Ave.
Round Rock, Texas

B. *IDENTITY OF EXPERTS*

Plaintiff does not expect to call an expert witness at trial.

C. *PROPOSED EXHIBITS*

Plaintiff may offer into evidence any one or more of the following exhibits:

EXHIBITS				
Exhibit	***Description of Exhibit***	***Offered***	***Objection***	***Admitted***
P-1	Background Screening Report 6/2/2015			
P-2	Background Screening Report 9/24/15			
P-3	Email Chain - Mark Walters and Tim Planz			
P-4	JD Palatine Dispute Policy			
P-5	JD Palatine Employee Handbook			
P-6	FCRA Summary of Rights			
P-7	Notice of Background Check by JD Palatine			
P-8	Email Chain - Mark Walters and Mark Gesch			
P-9	Employment Application of Mark Walters			
P-10	Judgment and Conviction			
P-11	Employment Denial Letter			

Plaintiff reserves the right to (i) ask the Court to take judicial notice of pleadings, transcripts and/or documents filed in or in connection with this case, (ii) offer rebuttal exhibits, and (iii) supplement or amend this Witness and Exhibit List within two weeks of the final pre-trial conference. Further, before the Court is the DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S FRAUD CLAIM, a JOINT AGREED MOTION FOR EXTENSION OF TIME FOR ALL PARTIES TO FILE THEIR DESIGNATION OF PROPOSED WITNESSES, TESTIFYING EXPERTS, & PROPOSED EXHIBITS, and because the General Objection Deadline is Monday June 22, 2017, Plaintiff reserves his right to supplement this Witness and Exhibit List as needed to address objections filed by any objecting party. The designation of any exhibit above does not waive any objection that Plaintiff may have to any exhibit listed on the Defendant's exhibit list.

Respectfully submitted,

/s/ **MARK WALTERS**

Mark Walters
P.O. Box 28072
Austin, Texas 78755
(512)-964-4343
verusconsultingtexas@gmail.com

Plaintiff Pro Se

NOTICE OF ELECTRONIC FILING

I, Mark Walters, do herby certify that I have electronically submitted for filing a correct copy of the foregoing PLAINTIFF'S DESIGNATION OF PROPOSED WITNESSES, TESTIFYING EXPERTS, & PROPOSED EXHIBITS in accordance with the Electronic Case Files System of the Western District of Texas, on the 8th day of May 2017.

/s/ MARK WALTERS
Mark Walters

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing PLAINTIFF'S DESIGNATION OF PROPOSED WITNESSES, TESTIFYING EXPERTS, & PROPOSED EXHIBITS have been served on May 8th, 2017 via email to the following:

Garret Hicks
c/o Thompson – Coe, LLP
701 Brazos St., Suite 1500
Austin, TX 78701
(512) 708-8200
GHicks@thompsoncoe.com

Attorney in Charge

/s/ **MARK WALTERS**
Mark Walters